

JUN 30 2008



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June 27, 2008



Erin J. Rednour
Remedial Project Manager
Illinois Environmental Protection Agency
Bureau of Land
Division of Remediation Management
Mailcode 24
Post Office Box 19276
Springfield, IL 62794-9276

Techlaw
Attn: Ann Anderson
205 West Wacker Drive
Suite 1622
Chicago, IL 60606

Re: Chemetco Site Information Request

Dear Mr. Rednour and Ms. Anderson:

Pursuant to time extensions granted by Mike Roubitchek on March 10, 2008 and May 19, 2008, attached please find the response of Olin Specialty Metals Corporation to the Request for Information Pursuant to Section 4(e) of the Illinois Environmental Protection Act regarding the Chemetco Site. Please direct any further correspondence in this matter to me at:

Curtis M. Richards
Corporate Vice President, Environment, Health & Safety
Olin Corporation
3855 North Ocoee Street
Suite 200
Cleveland, TN 37312.

Very truly yours,

A handwritten signature in cursive script that reads 'Curtis M. Richards'.

Curtis M. Richards
Corporate Vice President, Environment, Health & Safety

Enclosure

**OLIN SPECIALTY METALS CORPORATION
CERCLA § 104(e) AND IEPA § 4(e) RESPONSE
FOR CHEMETCO SITE, HARTFORD, ILLINOIS**

June 27, 2008

General Objections:

Olin Specialty Metals Corporation ("OSMC") objects to each and every question to the extent it exceeds the authority of the Illinois Environmental Protection Agency ("Illinois EPA") under the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA") and the Illinois Environmental Protection Act ("IEPA"), insofar as a particular question fails to limit the scope of the inquiry to:

1. The identification, nature, and quantity of materials which have been or are generated, treated, stored, or disposed of at the Site (as defined in the Request for Information), as provided in CERCLA § 104(e)(2)(A), 42 U.S.C. § 9604(e)(2)(A);
2. The nature or extent of a release of a hazardous substance or pollutant or contaminant at or from the Site, as provided in CERCLA § 104(e)(2)(B), 42 U.S.C. § 9604(e)(2)(B);
3. Information relating to the ability of OSMC to pay for or perform a cleanup, as provided in CERCLA § 104(e)(2)(C), 42 U.S.C. § 9604(e)(2)(C); or
4. Information relating to violations of the IEPA, any rule or regulation adopted under the IEPA, any permit or term or condition of a permit, or any Illinois Pollution Control Board order, as provided in IEPA § 415 ILCS 5/4(e).

For each and every question, OSMC also objects to the definitions and instructions included in the Request for Information as exceeding the scope of Illinois EPA's authority for purposes of a CERCLA § 104(e) and IEPA § 4(e) request.

OSMC objects to each question to the extent the question asks for information or documents protected by the attorney-client and/or work-product privileges. OSMC further objects to identifying all documents consulted or examined that are not relevant to or have not been used in the preparation of OSMC's response, or are subject to the attorney-client and/or work-product privileges.

Questions

1. *Identify the person(s) answering this Information Request on behalf of the Respondent.*

Response: Curtis M. Richards
Corporate Vice President, Environment, Health & Safety
Olin Corporation
3855 North Ocoee Street
Suite 200
Cleveland, TN 37312.

Please direct any correspondence in this matter to the above individual.

2. *Identify all person(s) consulted in the preparation of the answers to these questions.*

Response: OSMC objects to providing information regarding legal consultations which are protected by the attorney-client privilege. OSMC also objects to identifying persons who were consulted in the preparation of OSMC's response but who did not have any relevant information. Without waiving these objections, the following individuals had relevant information in the preparation of the answers to these questions:

Amy J. Watson, Paralegal, Olin Corporation, 427 N. Shamrock Street, East Alton, Illinois 63024

Lorraine M. Miller, Principal Environmental Specialist/Corporate Records Officer
Olin Corporation, 3855 North Ocoee Street, Suite 200, Cleveland, TN 37312.

3. *Identify the parent corporation and all subsidiaries of the Respondent.*

Response: The parent corporation of OSMC is Olin Corporation. OSMC has no subsidiaries.

4. *Identify all documents consulted, examined, or referred to in the preparation of the answers to these questions, and provide copies of all such documents.*

Response: OSMC objects to identifying all documents consulted, examined, or referred to in the preparation of the answers to these questions to the extent such documents are not relevant to or have not been used in the preparation of OSMC's response, or are subject to the attorney-client and/or work-product privileges. See General Objections. OSMC has been unable to locate any information that indicates it sent any materials to the Site and it has located no OSMC or other documents that indicate it sent materials to the Chemetco Site.

5. *If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question or who may be able to provide additional responsive documents, identify such persons. Provide the current or most recent known address and telephone number of each individual identified.*

Response: None.

6. *Describe your company's business activities which resulted in sending material to the Chemetco Site.*

Response: OSMC has been unable to locate any information that indicates it sent any material to the Chemetco Site. OSMC is a dormant subsidiary of Olin Corporation that does not engage in any business activities at present.

7. *Identify all persons having knowledge or information about the generation, transportation to, treatment, disposal, or other handling of hazardous substances (including materials containing lead, cadmium, boron, copper, iron, manganese, mercury, nickel, selenium, sulfate, zinc or other heavy metals), by you, your contractors, subcontractors or by prior owners and/operators which relates or may relate to the Chemetco Site, including but not limited to persons who arranged- for disposal of or transported hazardous substances to the Chemetco Site.*

Response: OSMC has not located any information that indicates it sent any material to the Chemetco Site.

8. *Describe your policies and procedures for the handling, treatment, storage and/or disposal of hazardous substances encountered in the course of your activities at the Site. Provide copies of records relating to this policy as well as to its implementation.*

Response: OSMC has not located any information that indicates it sent any material to the Chemetco Site.

9. *Identify all individuals who currently have, or who previously had, responsibility for your company's environmental matters (e.g., responsibility for the disposal, treatment, storage, recycling, or sale of your company's wastes, scrap materials and/or recyclable materials). For each, indicate the dates of the individual's employment and the nature of the individual's duties and responsibilities, and a description of the type of environmental information that the individual would possess.*

Response: OSMC objects to the above question in that it assumes that OSMC engages in activities for which oversight over environmental matters is required. OSMC has located no information that it has engaged in activities that resulted in the shipment or transfer of materials to the Chemetco Site, therefore, it is unable to provide a list of individuals who would be responsible for the environmental aspect of that activity.

10. *Provide all information in your possession that shows that you were in compliance with applicable federal environmental regulations or standards regarding the recycling of materials, particularly Section 127 of CERCLA, 42 U.S.C. 9627, sent to the Chemetco Site.*

Response: OSMC has not located any information that indicates it sent any material to the Chemetco Site.

11. *Was any shipment of material sent to the Chemetco Site ever refused and/or returned? If so, describe this event in detail, including its cause and outcome.*

Response: OSMC has not located any information that indicates it sent any material to the Chemetco Site.

12. *Was any material shipment sent to the Chemetco Site ever subject of a change in payment terms because of increase of handling costs or any problem with the material sent to the Site? If so, describe this event in detail, including its cause and outcome.*

Response: OSMC has not located any information that indicates it sent any material to the Chemetco Site.

13. *Provide copies of the Material Data Safety Sheets for any materials disposed of or shipped to or stored at the Chemetco Site.*

Response: OSMC has not located any information that indicates it sent any material to the Chemetco Site.

14. *Have you ever received a formal Information Request [similar to this one] from local, state or federal government concerning the recycling of materials at other scrap yards? Provide a copy of the Request and your response.*

Response: OSMC has not received a formal Information Request similar to this one concerning the recycling of materials at other scrap yards.

15. *Specify whether your company was ever the subject of legal action by any party, including the government, by virtue of your transportation of hazardous substances or other waste materials to the Site. If so, describe in detail and provide any records associated with such legal action.*

Response: OSMC has not located any information that indicates it was ever the subject of legal action by virtue of transportation of materials to the Chemetco Site.

16. *Identify all liability insurance policies held by Respondent from the period you transported materials or other waste materials to the Site. In identifying such policies, state the name and address of each insurer and of the insured, the amount of coverage under each policy, the commencement and expiration date for each policy, whether or not the policy contains a "pollution exclusion" clause, and whether the policy covers or excludes sudden, non-sudden, or both types of accidents. Provide complete copies of all relevant insurance policies.*

Response: OSMC objects to this request on the grounds that it goes beyond the authority of IEPA under CERCLA § 104(e) and IEPA § 415 ILCS 5/4(e). See General Objections. Without waiving this objection, OSMC states that it had and does have insurance policies which were in effect during various time periods. If OSMC is ever adjudged to be responsible for liabilities arising from the Site, OSMC and its insurance carriers will determine whether or not specific insurance policies provide coverage for specific occurrences.

17. *List all USEPA, RCRA and State of Illinois Identification Number(s) of your company.*

Response: OSMC does not have a USEPA, RCRA or State of Illinois Identification Number associated with environmental matters.

18. *Identify all transactions or agreements for disposal in which your company disposed of, arranged for the disposal or treatment of, transported, or arranged for the transportation of any material or item, scrap materials, waste materials to the Site (including but not limited to drosses, slags, sludges, powders, or combustible materials).*

Response: OSMC has not located any information that indicates it sent any material to the Chemetco Site.

In addition:

- (a) *Identify whether the materials were sent pursuant to a contractual arrangement and, if so, describe the terms of that arrangement.*

Response: Not applicable. See above answer.

- (b) *Identify whether the materials were delivered directly to the Chemetco site or were trans-shipped there from another intermediate delivery point. If applicable, describe each such delivery point.*

Response: Not applicable. See above answer.

- (c) *Identify the persons involved in sending such material to the Site.*

Response: Not applicable. See above answer.

- (d) *State the dates on which each such persons may have transported or delivered for transport such material.*

Response: Not applicable. See above answer.

- (e) *Describe the source of or the process that produced the materials.*

Response: Not applicable. See above answer.

- (f) *Describe the materials or items, including type of material, chemical content, physical state, quantity by volume and weight, and other characteristics.*

Response: Not applicable. See above answer .

- (g) *Describe the nature, including the chemical content, characteristics, physical state (e.g., solid, liquid) and quantity (volume and weight) of all hazardous substances involved in each such arrangement.*

Response: Not applicable. See above answer.

- (h) *State whether any of the material was ever tested by your company and if so, whether the hazardous substances exhibited any of the characteristics of a hazardous waste identified in 35 Illinois Administrative Code 721, Subpart C or 40 C.F.R. 261; Subpart C.*

Response: Not applicable. See above answer .

- (i) *Describe what was done to materials once they were brought to the Chemetco Site, including any further processing of the materials.*

Response: Not applicable. See above answer.

- (j) *Describe as precisely as possible any and all of the locations at which each hazardous material involved in such transactions actually was disposed or treated.*

Response: Not applicable. See above answer.

- (k) *Describe any measures taken by the Respondent prior to or during each arrangement to determine the compliance history of the Site where the treatment of disposal would actually take place.*

Response: Not applicable. See above answer.

19. *Describe in general detail the types of material that your company arranged for the transportation of or transported for recycling at Chemetco. In your response, please provide answers to the following questions:*

- (a) *Give the generic name of each type of materials shipped to Chemetco (e.g., scrap metal, batteries, scrap paper, scrap plastic, scrap textile (scrap material), scrap electronic equipment, etc.).*

Response: OSMC has not located any information that indicates it sent any material to the Chemetco Site.

- (b) *Specify the quantity (volume and weight) of materials your company sent to Chemetco for recycling on a year by year basis.*

Response: OSMC has not located any information that indicates it sent any material to the Chemetco Site.

20. *Provide any additional information and all documents that you believe relate to the type, nature and characteristics of the materials your company sent to the Chemetco Site.*

Response: No further information.

Questions and Requests for Documents Related to Scrap Metal

21. *For the following questions which relate to transactions involving scrap metals, provide the requested information, and also provide copies of any documents that contain any information that is related to the response:*

Answer: OSMC has been unable to locate any information that indicates it sent any material to the Chemetco Site, including scrap metal.

- (a) *List the years in which your company sent scrap metal to Chemetco and/or broker for recycling. In this list state the type and approximate quantity, volume and weight of scrap metal sent for each year.*

Response: Not applicable. See response above.

- (b) *Did a market exist for the scrap metal listed in your response to 21 (a) above? If so, describe the nature of such a market at the time of the transaction (possible uses, possible consumers, etc.) and the source of that commercial specification grade (e.g., Institute of Scrap Recycling Industries, Inc. (ISRI), Department of Defense, or wherever your company would find the grade published).*

Response: Not applicable. See response above.

- (c) *What commercial specification grade did the scrap metal listed in your response to question 21(a) meet? Identify/list the commercial specification grades that each scrap metal identified in 21 (a) met.*

Response: Not applicable. See response above.

- (d) *At the time of the transaction(s) what was the intended disposition of the scrap metal listed in your response to question 21(a)? Did this include burning as fuel, or for energy recovery, or incineration?*

Response: Not applicable. See response above.

- (e) *After sale, transfer, delivery, or disposal, what portion of the scrap metal listed in your response to question 21 (a) was to be made available for use as a feedstock for manufacturing of new saleable products? Explain how the portion identified in this answer was derived or calculated.*

Response: Not applicable. See response above.

- (f) *Could the scrap metal listed in your response to question 21 (a) have been used as a replacement or substitute for a virgin raw material? If so, provide details.*

Response: Not applicable. See response above.

- (g) *Could any products made from the scrap metal listed in your response to question 21 (a) have been used as a replacement or substitute for a product made, in whole or in part, from a virgin raw material? If so, provide details.*

Response: Not applicable. See response above.

- (h) *Did your company melt the scrap metal listed in your response to question 21 (a) before it was transported/delivered to the Site? If yes, describe the process used for melting the scrap metal. In addition, explain whether Chemetco ever received for processing "dross" or "skimmings" or "sludges" at the Site.*

Response: Not applicable. See response above.

- (i) *Was the transaction between your company and Chemetco: 1) an outright sale; 2) subject to a written or verbal "tolling" agreement between the companies; or 3) reflected the "banking" of the transacted material in a metal account at the request of your company for return or other disposition at a later date?*

Response: Not applicable. See response above.

- (j) *Describe the source of or the process that produced the materials.*

Response: Not applicable. See response above.

22. *Did any of the scrap material sent to Chemetco contain other material(s) incident to or adhering to the scrap? If so, describe in detail.*

Response: OSMC has not located any information that indicates it sent any material to the Chemetco Site.

23. *Did any of the material sent to Chemetco contain wire or wiring? If so, was the wire's insulation first stripped before being shipped to or accepted at Chemetco, after being received at the Site, or was the wire not stripped?*

Response: OSMC has not located any information that indicates it sent any material to the Chemetco Site, including wire or wiring.

24. *Did the material shipped include drums or shipping containers? If so, specify the generators of the drums or shipping containers, the capacity of such drums or containers and whether such containers ever contained liquid of any sort. If so, specify the type of liquid and whether such liquids contained wastes of any kind.*

Response: OSMC has not located any information that indicates it sent any material to the Chemetco Site.

25. *Describe all efforts (i.e., site visits) taken by your company to determine what would be done with the scrap metal identified in your response to question 21(a).*

Response: Not applicable. See answer to question 21(a).

26. *What steps (e.g., internal procedures, federal, state, and local compliance inquiries) were taken by your company to ensure that Chemetco was in compliance with applicable Federal, State, or local environmental regulations or standards, and any amendments, with respect to scrap metal?*

Response: Not applicable. OSMC has not located any information that indicates it sent any material to the Chemetco Site or that it had any relationship with Chemetco.

27. *Describe the efforts your company undertook with respect to the management and handling of the scrap metal listed in your response to question 21(a), including the extent to which you complied with customary industry practices current at the time of the transaction designed to minimize contamination of the Site and/or releases of hazardous substances at the Site.*

Response: Not applicable. See answer to question 21(a).

28. *Provide all information in your possession that shows that your company was in compliance with applicable Federal, State, and local environmental regulations or standards regarding the storage, transport, management, or other activities associated with the recycling of scrap metal listed in your response to question 21(a).*

Response: Not applicable. See answer to question 21(a).

Questions and Request for Documents Related to Batteries

Answer to battery questions: OSMC has not located any information indicating it sent batteries to Chemetco.

29. *For the following questions which relate to transactions involving batteries (lead-acid batteries, nickel-cadmium batteries, reject batteries, lithium, and other spent batteries), provide the requested information, and also provide copies of any documents that contain any information that is related to the response:*

- (a) *Provide an estimate of all shipments of whole batteries sent to the Site on an annual basis. In this list, provide an approximation of number of batteries, type of battery (e.g., lead-acid, nickel-cadmium, lithium, reject, or other) and quantity sent.*

Response: Not applicable. See answer above.

- (b) *What commercial specification grade did the batteries listed in your response to question 29(a) meet? Identify/list the commercial specification grades that each type of battery identified in question 29(a) met.*

Response: Not applicable. See answer above.

- (c) *Did a market exist for the batteries listed in your response to question 29(a)? If so, describe the nature of such market at the time of the transaction (possible uses, possible consumers, etc.) and the source of that commercial specification grade (e.g., Institute of Scrap Recycling Industries, Inc. (ISRI), Department of Defense, or wherever your company would find the grade published).*

Response: Not applicable. See answer above.

- (d) *At the time of the transaction, what was the intended disposition of the batteries listed in your response to question 29(a)?*

Response: Not applicable. See answer above.

- (e) *What portion of the batteries listed in your response to question 29(a) were to be made available for use as a feedstock for manufacturing new saleable products? Explain how the portion identified in this answer was derived or calculated.*

Response: Not applicable. See answer above.

- (f) *Could the batteries listed in your response to question 29(a) have been used as a replacement or substitute for a virgin raw material? If so, provide details.*

Response: Not applicable. See answer above.

- (g) *Could any products to be made from the batteries listed in your response to question 29(a) have been used as a replacement or substitute for a product made, in whole or in part, from a virgin raw material? If so, provide details.*

Response: Not applicable. See answer above.

- (h) *Was the transaction between your company and Chemetco: 1) an outright sale; 2) subject to a written or verbal "tolling" agreement between the companies; or 3) reflected the "banking" of the transacted material in a metal account at the request of your company for return or other disposition at a later date.*

Response: Not applicable. See answer above.

- (i) *What, if any, components of the whole batteries listed in your response to question 29(a) were removed before transport to the Site? Describe what was removed, and where such removal occurred. Include in your description any attempt to remove any hazardous substances (e.g., battery paste/mud, battery acid) from the components.*

Response: Not applicable. See answer above.

- (j) *Were the components of the whole batteries removed once delivered to the Chemetco Site? Describe the method used to recover the components. Include in your description any attempt to remove any hazardous substances (e.g., battery paste/mud, battery acid) from the components.*

Response: Not applicable. See answer above.

(k) *Describe the source of or the process that produced the materials.*

Response: Not applicable. See answer above.

30. *Describe all efforts (i.e., site visits) taken by your company to determine what would be done with the batteries identified in your response to question 29(a).*

Response: Not applicable. See answer to question 29(a).

31. *What steps (e.g., internal procedures, federal, state, and local compliance inquiries) were taken by your company to ensure that Chemetco was in compliance with applicable Federal, State, or Local environmental regulations or standards, and any amendments with respect to batteries?*

Response: Not applicable. OSMC has not located any information that indicates it sent any batteries to Chemetco.

32. *Describe the efforts your company undertook with respect to the management and handling of the batteries listed in your response to question 29(a), including the extent to which you complied with customary industry practices current at the time of the transaction, designed to minimize contamination of the Site and/or releases of hazardous substances at the Chemetco Site.*

Response: Not applicable. See answer to question 29(a).

33. *Provide all information in your possession that shows that you were in compliance with applicable Federal environmental regulations or standards regarding the storage, transport, management, or other activities associated with the recycling of batteries listed in your response to question 29(a).*

Response: Not applicable. See answer to question 29(a).

34. *For the following questions which relate to transactions involving scrap paper, plastic, glass, textiles or rubber (scrap material), provide requested information, and also provide copies of any documents that contain any information that is related to the response:*

Answer: OSMC has not located any information that indicates it sent any material to the Chemetco Site, including scrap paper, plastic, glass, textiles or rubber.

(a) *Provide an estimate of all shipments of scrap paper, plastic, glass, textile or rubber your company sent to Chemetco on an annual basis. In this list, include the type and an estimate of the quantity, volume and weight of scrap material sent to the Site each year.*

Response: Not applicable. See answer above.

- (b) *What commercial specification grade did the scrap material listed in your response to question 36(a) meet? List/identify the commercial specification grades that each scrap material identified in 36(a) met.*

Response: Not applicable. See answer above.

- (c) *Did a market exist for the scrap materials listed in your response to question 34(a) above? If so, describe the nature of such market at the time of the transaction (possible uses, possible consumers, etc.) and the source of that commercial specification grade (e.g., Institute of Scrap Recycling Industries, Inc. (ISRI), Department of Defense, or wherever your company would find the grade published).*

Response: Not applicable. See answer above.

- (d) *At the time of the transaction(s), what was the intended disposition of the scrap material listed in your response to question 34(a)? Did the intended disposition include burning as a fuel, or for energy recovery or incineration?*

Response: Not applicable. See answer above.

- (e) *After sale, transfer, delivery, or disposal, what portion of the scrap material listed in your response to question 36(a) was to be made available for use as a feedstock for manufacturing of new saleable products? Explain how the portion identified in this answer was derived or calculated.*

Response: Not applicable. See answer above.

- (f) *Could the scrap material listed in your response to question 34(a) have been used as a replacement or substitute for a virgin raw material? If so, provide details.*

Response: Not applicable. See answer above.

- (g) *Could any products to be made from the scrap material listed in your response to question 34(a) have been used as a replacement or substitute for a product made, in whole or in part, from a virgin raw material? If so, provide details.*

Response: Not applicable. See answer above.

- (h) *Describe the source of or the process that produced the materials.*

Response: Not applicable. See answer above.

35. *Describe all efforts (i.e., site visits) taken by your company to determine what would be done with the scrap material identified in your response to question 34(a).*

Response: Not applicable. See answer to question 34(a) above.

36. *What steps (e.g., internal procedures, federal, state, and local compliance inquiries) were taken by your company to ensure that Chemetco was in compliance with applicable Federal, State, or Local environmental regulations or standards, and any amendments with respect to scrap material?*

Response: Not applicable. OSMC has not located any information that indicates it sent any material to the Chemetco Site, including scrap material.

37. *Describe the efforts of your company undertook with respect to the management and handling of the scrap material listed in your response to question 34(a), including the extent to which you complied with customary industry practices current at the time of the transaction designed to minimize contamination of the Site and/or releases of hazardous substances at the Site.*

Response: Not applicable. See answer to question 34(a) above.

38. *Provide all information in your possession that shows that you were in compliance with applicable Federal environmental regulations or standards regarding the storage, transport, management, or other activities associated with the recycling of scrap material listed in your response to question 34(a).*

Response: Not applicable. See answer to question 34(a) above.

Questions and Request for Documents Related to Electrical and Electronic Equipment

Answer to electrical equipment questions: OSMC has not located any information indicating it sent electrical or electronic equipment to Chemetco.

39. *For the following questions which relate to transactions involving electrical and electronic equipment (e.g., transformers, capacitors, white goods, computers or other electrical equipment), provide the requested information, and also provide copies of any documents that contain any information that is related to the response:*

Answer: OSMC has not located any information that it sent electrical and/or electronic equipment to Chemetco.

- (a) *List an estimated number of shipments of electrical and electronic equipment your company sent to Chemetco on an annual basis. In this list, include the following:*

- i. *the type and quantity, volume and weight of electrical and electronic equipment sent;*

Response: Not applicable. See answer above.

- ii. *the amount paid or collected in connection with the transaction for each category of electrical and electronic equipment and the method of payment.*

Response: Not applicable. See answer above.

- (b) *At the time of the transaction(s), what was the intended disposition of the electrical and electronic equipment listed in your response to question 39(a)? Did the intended disposition include burning as fuel or for energy recovery or incineration?*

Response: Not applicable. See answer above.

- (c) *Describe the source of or the process that produced the materials.*

Response: Not applicable. See answer above.

40. *Describe all efforts (i.e., site visits) taken by your company to determine what would be done with the electrical and electronic equipment identified in your response to question 39(a).*

Response: Not applicable. See answer to question 39(a) above.

41. *What steps (e.g., internal procedures, federal, state, and local compliance inquiries) were taken by your company to ensure that Chemetco was in compliance with applicable Federal, State, or Local environmental regulations or standards, and any amendments with respect to electrical and electronic equipment?*

Response: Not applicable. OSMC has not located any information that indicates it sent any material to the Chemetco Site, including electronic equipment.

42. *Describe the efforts your company undertook with respect to the management and handling of the electrical and electronic equipment listed in your response to question 39(a), including the extent to which your company complied with customary industry practices current at the time of the transaction designed to minimize contamination of the Site and/or releases of hazardous substances at the Site.*

Response: Not applicable. See answer to question 39(a) above.

43. *Provide all information in your possession that shows that you were in compliance with applicable Federal environmental regulations or standards regarding the storage,*

transport, management, or other activities associated with the recycling of the electrical and electronic equipment listed in your response to question 39(a).

Response: Not applicable. See answer to question 39(a) above.